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Attorneys for Stardock Systems, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

STARDOCK SYSTEMS, INC.,

Plaintiff,

vs.

PAUL REICHE III and ROBERT
FREDERICK FORD,

Defendants.

AND RELATED COUNTERCLAIM AND
CROSS-COMPLAINT

Case No.: 17-cv-07025-SBA

**STARDOCK SYSTEMS, INC.'S AND
VALVE CORPORATION'S WRITTEN
REQUEST FOR AN EMERGENCY
TELEPHONIC CONFERENCE**

[DISCOVERY MATTER]

Judge: Hon. Kandis A. Westmore

Written Request for an Emergency Telephonic Conference

Yesterday, February 6, 2019, Plaintiff/Counter-Defendant Stardock Systems, Inc. (“Stardock”) and Cross-Defendant Valve Corporation (“Valve”) (collectively the “Moving Parties”) filed their Motion for a protective order in the form of a stay of party depositions for 60 days, as well as a renewed motion for a modified Scheduling Order. (Dkt. 106.)

In that motion, Stardock and Valve request that the Court:

- (1) Issue a protective order staying party depositions until April 6, 2019;
- (2) Issue a new case management order that sets the deadlines in this Action as:

- a. Party Depositions to resume—on or after April 6, 2019
- b. Fact Discovery cutoff—May 15, 2019
- c. Expert designation (party with burden)—June 7, 2019
- d. Rebuttal expert witness designation—July 21, 2019
- e. Expert discovery cutoff—August 15, 2019
- f. Dispositive motion hearing cutoff –November 7, 2019
- g. Pretrial conference—February 14, 2020
- h. Trial—March 2, 2020; and

- (3) Set a status conference to discuss any other expectations regarding the administration of the Instant Action.

Depositions of Stardock party-witnesses currently are set to resume on February 11, 2019 in Ann Arbor, Michigan (Mr. Wardell is scheduled for February 11 and Mr. Shaw for February 13; additionally, non-party Mr. Perlmuter is scheduled for February 14). In light of the impending scheduled depositions and the Motion for a Protective Order, **Counsel for the Moving Parties request an emergency phone conference with Magistrate Judge Westmore at the Court’s**

1 earliest convenience; Counsel for Moving Parties is available any time after 3:00 p.m. PST
2 today or any time tomorrow (February 7 or 8, 2019).
3
4

5 Dated: February 7, 2019

NIXON PEABODY LLP

7 By: /s/ Deanna R. Kunze

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